

COMMONWEALTH OF MASSACHUSETTS
BEFORE THE
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Bay State Gas Company

D.T.E. 06-36

Data Requests by Sprague Energy Corp. Addressed to Bay State Gas Company

NOW COMES Sprague Energy Corp. ("Sprague Energy") and requests the answers by Bay State Gas Company ("Bay State") in writing and under oath to the following requests:

A. Definitions.

As used herein:

- a) "Document" refers to any written, printed, recorded, taped, electronic, or graphic matter, including but not limited to, writings, agreements, licenses, contracts, books, pamphlets, periodicals, memoranda, correspondence, notes, diaries, calendars, appointment books, estimates, reports, intra-office communications, work papers, records, filings, cost sheets, estimating sheets, studies, analyses, evaluations, purchase orders, bills, invoices, confirmations, receipts, ledgers, accounts, charts, graphs, indices, computer printouts, data sheets, data processing cards, tapes or discs, and any other data compilation from which information can be obtained or translated, if necessary, through detection devices into reasonably usable form, records, transcriptions thereof, minutes of meetings, and all other materials relating to any conversations, meetings and/or conferences, by telephone or otherwise, and any other kind of writing or recording, however, produced or reproduced, of any kind or description, whether privileged or not privileged, including originals, non-identical copies (whether different from the original because of notes made on or attached to such copy or otherwise), and drafts, regardless of origin, whether sent or received or made and/or used internal, in whatever form, and both sides thereof, that (a) are now or formerly in the

possession, custody, or control of the answering parties or (b) are known or believed to be responsive to these interrogatories, regardless of who now has or formerly has had possession, custody, or control.

- b) “Identify” or “identity” when used in reference to a Document means to state the date or dates, author or originator, subject matter, all addresses and recipients, type of Document (e.g., letter, memorandum, telegram, chart, computer printout, disc or diskette, etc.), number or code number thereof or other means to identify it and its present location and custodian. If any such Document was, but is no longer, in the answering parties’ possession or subject to its control, the responding party shall state what disposition was made of it.
- c) “Person” means without limiting the generality of its meaning, every natural person, corporation, partnership, association (whether formally organized or ad hoc), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency, or any other group or other organization.

B. Instructions.

- 1) These requests call for all information, including information contained in Documents, which relate to the subject matter of the discovery requests and which is known or available to you.
- 2) Where a data request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a data request should clearly indicate the subdivision, part, or portion of the data request to which it is directed.
- 3) If an interrogatory specifically requests an answer in response rather than the production of Documents, an answer is required. The production of Documents will not suffice.
- 4) These data requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
- 5) Each data request to “provide” Documents or similar phrases includes a request to “identify” all such Documents, as defined in the definitions above.
- 6) For each Document produced or identified in a response which is computer generated, state separately: (a) what types of data, files, or diskettes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., diskettes, tapes, discs), (c)

a description of the recordation system employed (including program descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.

- 7) If a data request can be answered in whole or in part by reference to the response to another data request served in this proceeding, it is sufficient to so indicate by specifying the other data request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other data request is a full or partial response to the instant data request. If it constitutes a partial response, the balance of the instant data request must be answered.
- 8) If you cannot answer a data request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why you can not answer the data request in full, and state what information or knowledge you have concerning the unanswered portions.
- 9) If, in answering any of these data requests, you feel that any data request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using in responding to the data request.
- 10) If a Document requested is unavailable, identify the Document, describe in detail the reasons the Document is unavailable, state where the Document can be obtained, and specify the number of pages it contains.
- 11) If you assert that any Document has been destroyed, state when and why it was destroyed, identify the person who directed the destruction or the explanation. If the Document was destroyed pursuant to your Document destruction program, identify and produce a copy of the guideline, policy or company manual describing such Document destruction program.
- 12) Identify the person who will bear ultimate responsibility for the truth of each response.
- 13) If no Document is responsive to a data request which calls for a Document, then so state. In each instance, the data request should be treated as an interrogatory

DATA REQUESTS BY SPRAGUE ENERGY – SET 1

- SPR-1-1 Please refer to Exhibit BSG-1, Attachment JAF-2. Please provide all analyses, workpapers and source data relied upon by Mr. Ferro in preparing Attachment JAF-2.
- SPR-1-2 Please refer to Exhibit BSG-1, Attachment JAF-2. Please explain whether Mr. Ferro was able to identify and isolate the under-deliveries related to grandfathered firm transportation customers as opposed to those related to other customers.
- SPR-1-3 For each date identified in Exhibit BSG-1, Attachment JAF-2, please state whether Bay State had declared an operational flow order or a critical day, separately for each of its operating areas.
- SPR-1-4 For each date identified in Exhibit BSG-1, Attachment JAF-2, please describe any operational problems caused by the indicated overtakes.
- SPR-1-5 For each calendar year beginning in 2001, please provide the number of gas marketers that have either ceased selling gas transported on Bay State's system or have sold their accounts to another marketer.
- SPR-1-6 Please provide an analysis comparable to Exhibit BSG-1, Attachment JAF-2, showing actual and percentage overtakes separately for marketers currently active on Bay State's distribution system versus those marketers who have since left Bay State's system or sold their accounts to another marketer.
- SPR-1-7 Please refer to Exhibit BSG-1, Attachment JAF-2. Please provide a comparable analysis for the days identified in the referenced attachment that shows the actual and percentage over/under deliveries for the non-daily metered pools, calculating over and under deliveries relative to the adjusted target volumes provided to suppliers by Bay State.
- SPR-1-8 Please refer to Exhibit BSG-1, Attachment JAF-2. Please provide a comparable analysis for the days identified in the referenced attachment that shows the actual and percentage over/under deliveries for the daily metered and non-daily metered pools combined, calculating over and under deliveries for non-daily metered pools relative to the adjusted target volumes provided to suppliers by Bay State.
- SPR-1-9 Please refer to Exhibit BSG-1, Attachment JAF-2. Please provide a comparable analysis for the following dates that shows the actual and percentage over/under deliveries for the daily metered pools, non-daily

metered pools, and the daily metered and non-daily metered pools combined, calculating over and under deliveries for non-daily metered pools relative to the adjusted target volumes provided to suppliers by Bay State:

- a) 1/18/2003
- b) 1/21/2003
- c) 1/22/2003
- d) 1/23/2003
- e) 1/28/2003
- f) 2/13/2003
- g) 2/14/2003
- h) 2/15/2003
- i) 2/16/2003
- j) 2/26/2003
- k) 1/9/2004
- l) 1/10/2004
- m) 1/11/2004
- n) 1/14/2004
- o) 1/15/2004
- p) 1/16/2004
- q) 1/24/2004
- r) 1/25/2004
- s) 12/20/2004
- t) 1/18/2005
- u) 1/21/2005
- v) 1/22/2005
- w) 1/23/2005
- x) 1/27/2005
- y) 1/15/2006

- SPR-1-10 In the event that the Department were to approve Bay State's proposal, please state whether, and, if so, to what extent, Bay State would acquire additional firm capacity or supply by reallocating excess capacity or supply from Northern Utilities.
- SPR-1-11 Please refer to Exhibit BSG-1, Attachment JAF-3. Please provide all analyses, source documents and workpapers relied upon by Mr. Ferro in the preparation of the referenced attachment.
- SPR-1-12 Please refer to Exhibit BSG-1, Attachment JAF-3. Does Bay State believe that it will be able to acquire additional capacity at or below its current, average annual unit capacity cost, as indicated in the referenced attachment? If so, please provide all analyses, source documents and workpapers supporting this belief.

- SPR-1-13 Please refer to Exhibit BSG-1, Attachment JAF-3. Is Bay State proposing that any additional capacity acquired pursuant to its proposal in this docket would be added to its overall system portfolio and that grandfathered transportation customers will pay the same average annual unit capacity cost for the 30% reserve margin that sales service customers pay through Bay State's cost of gas adjustment clause and non-grandfathered transportation customers pay via their assignment of capacity? If so, please explain what reconciliation process will exist to true up the rates paid by grandfathered customers against the actual capacity costs, net of capacity release and off system sales, realized by Bay State. If not, please explain how Bay State proposes to segregate costs and capacity release and off system sales revenues.
- SPR-1-14 Please refer to Exhibit BSG-1, Attachment JAF-3. If, in its response to SPR-1-13, Bay State is proposing that all customers would be subject to the same average annual unit capacity cost, does Bay State agree that the acquisition of additional capacity to supply the 30% planning requirement could result in higher costs to sales service customers and non-grandfathered transportation customers? Please explain.
- SPR-1-15 Please refer to Exhibit BSG-1, Attachment JAF-3. Please provide a comparable analysis assuming that the additional capacity acquired by Bay State costs the same as the most expensive long-term capacity currently held in Bay State's portfolio.